

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION**

THE CITY OF ANNAPOLIS, MARYLAND,

Plaintiff,

v.

PURDUE PHARMA L.P.; PURDUE PHARMA  
INC.; THE PURDUE FREDERICK COMPANY;  
TEVA PHARMACEUTICALS USA, INC.;  
CEPHALON, INC.; JOHNSON & JOHNSON;  
JANSSEN PHARMACEUTICALS, INC.;  
ORTHO-MCNEIL-JANSSEN  
PHARMACEUTICALS, INC. n/k/a JANSSEN  
PHARMACEUTICALS, INC.; JANSSEN  
PHARMACEUTICA, INC. n/k/a JANSSEN  
PHARMACEUTICALS, INC.; ENDO HEALTH  
SOLUTIONS INC.; ENDO  
PHARMACEUTICALS INC.; INSYS  
THERAPEUTICS, INC.; CARDINAL HEALTH,  
INC.; MCKESSON CORPORATION;  
AMERISOURCEBERGEN DRUG  
CORPORATION; WILLIAM THAM, M.D.;  
PHYSICAL MEDICINE AND PAIN  
MANAGEMENT ASSOCIATES, P.C.; KOFI  
SHAW-TAYLOR; HAPPINESS AGUZIE;  
TORMARCO HARRIS; MINNIE NDEM;  
STARLIFE WELLNESS CENTER LLC;  
LAWRENCE VIDAVER, M.D.; and  
MARYLAND HEALING WATERS, LLC f/k/a  
MARYLAND HEALING WATERS LLC,

Defendants.

Case No. 1:19-cv-01162-GLR

Action Filed: February 26, 2019

Action Served: March 20, 2019

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**DECLARATION OF JOHN A. FREEDMAN IN SUPPORT OF  
NOTICE OF REMOVAL PURSUANT TO CIVIL LOCAL RULE 103.5(A)**

I, John A. Freedman, do hereby declare under penalty of perjury as follows:

1. I make this declaration pursuant to Civil Local Rule 103.5(a) in support Defendants Endo Health Solutions Inc. and Endo Pharmaceuticals Inc.'s Notice of Removal.
2. Attached as Exhibit 1 is a true and correct copy of all documents filed in the state court action (except the Complaint, which was filed with the Notice of Removal), captioned *The City of Annapolis, Maryland v. Purdue Pharma L.P. et al.*, bearing case number C-02-CV-19-000594 in the Circuit Court of Maryland for Anne Arundel County, prior to removal.

DATED: May 3, 2019

/s/ John A. Freedman  
John A. Freedman (D. Md. Bar No. 20276)  
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## CERTIFICATE OF SERVICE

The undersigned hereby certifies on this 3<sup>rd</sup> day of May, 2019 I directed that the foregoing to be e-filed with this Court's electronic filing system and thereby served via the Court's ECF filing system on all parties requiring electronic notification.

The undersigned further certifies on this 3<sup>rd</sup> day of May, 2019 I directed that the foregoing be served by first-class mail, postage prepaid to:

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Dated: May 3, 2019

/s/ John A. Freedman

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